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March 23, 2022

VIA ECF

Honorable Katherine Polk Failla United States District Court Southern District of New York 40 Foley Square New York, NY 10007



Re: Flash90 Ltd. v. Sahara Reporters Media Group, Inc., 1:21-cv-08969 (KPF)

Dear Judge Failla:

We represent Plaintiff Flash90 Ltd. in the above-captioned case and write pursuant to Section 2.D of the Court's Individual Rules Practice to respectfully request a thirty (30) day extension of time to file a Notice of Dismissal or to re-open the matter;

- 1) The current deadline to re-open case is March 23, 2002 [Dkt. No. 14];
- 2) A previous request for an extension of this deadline was made on January 20, 2022 [Dkt. No. 10]
- 3) The previous request for an extension was granted [Dkt. No. 11]
- 4) Despite best efforts, the parties were not able to consummate the transaction by the current deadline; Plaintiff anticipates that this will be the final request for an extension
- 5) Defendant Sahara Reports Media Group, Inc. consents to the requested relief.

No other scheduled dates will be impacted by this request.

Respectfully Submitted,

s/jameshfreeman/ James H. Freeman

Counsel for Plaintiff

Application GRANTED. The deadline for the parties to file a Notice of Dismissal or otherwise move to re-open the case is hereby extended to April 22, 2022. The Clerk of Court is directed to terminate the pending motion at docket number 15.

Dated: March 24, 2022

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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